

United States District Court**DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

ANTHONY P. RAYMOND

CASE NUMBER: 04- *m00079-LPC*

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 19, 2004 in Middlesex County, in the District of Massachusetts defendant, (Track Statutory Language of Offense)

By force and violence and by intimidation, took from the person and presence of employees of Citizen's Bank, money belonging to and in the custody, control, management, and possession of Citizen's Bank, a federally insured financial institution, and did assault and put in jeopardy the lives of other persons by the use of a dangerous weapon and device, to wit, a gun,

in violation of Title 18, United States Code, Section(s) 2113(a) and (d);

I further state that I am a(n) Special Agent, Federal Bureau of Investigation and that this complaint is based on the following facts:

Official Title

See Attached Affidavit

Continued on the attached sheet and made a part hereof:



Yes



No

Sworn to before me and subscribed in my presence,

Robert Rice
Signature of Complainant
Robert Rice
Special Agent, Federal Bureau of Investigation
United States Department of Justice

Date

at

Boston, Massachusetts

City and State

11/10/04
HON. Lawrence P. Cohen, United States Magistrate Judge
Name & Title of Judicial Officer

James P. K.
Signature of Judicial Officer

AFFIDAVIT

I, Robert Rice, having been duly sworn, do hereby depose and say:

1. My name is Robert Rice and I am a Special Agent of the Federal Bureau of Investigation ("FBI") and have been so employed for approximately eight months. I am currently assigned to the Boston Division of the FBI at Boston, Massachusetts. I am currently assigned to the Boston Bank Robbery Task Force ("Task Force"), which is comprised of personnel of the FBI, the Massachusetts State Police and the Boston and Cambridge Police Departments.

2. In addition to my own training and experience, I have drawn from that of my fellow case agents, Special Agent Gary S. Cacace, who has been in the FBI for approximately thirteen years and has worked bank robbery investigations for approximately seven years; and Special Agent Geoffrey J. Kelly, who has been in the FBI for almost nine years and has worked bank robbery investigations for over three and one half years.

3. I am aware that Title 18 of the United States Code, Section 2113(a) makes it a crime for anyone to use force and violence, or intimidation, to take money belonging to or in the care, custody, control, management, possession of any federally insured bank. I am also aware that Title 18 of the United States Code, Section 2113(d) makes it a crime for anyone to assault any person, or put in jeopardy the life of any person by the use of a dangerous weapon or device while in violation of Title 18 of the United States Code, Section 2113(a). Having so said, I make this Affidavit in support of a Criminal Complaint charging Anthony P. Raymond with the armed robbery of the Citizen's Bank branch located at 876 Main Street in Malden, Massachusetts on Thursday, August 19, 2004 at approximately 3:15 p.m.

4. Through investigation, I know that the deposits of Citizen's Bank are insured by the

Federal Deposit Insurance Corporation ("FDIC").

5. The facts stated herein are based on my own personal involvement in this investigation and my discussions with other law enforcement officers also involved in the investigation. In submitting this Affidavit, however, I have not included each and every fact known to me about the investigation, but only those facts which I believe are sufficient to establish the requisite probable cause.

6. As part of the investigation of the robbery of Citizens Bank, 876 Main Street, Malden, Massachusetts ("the bank"), on August 19, 2004, Special Agents from the Task Force interviewed several victims and witnesses and learned the following:

a) A witness outside of the bank who, at a time just prior to the robbery, observed a black Jeep Wrangler (the "Jeep") parked in front of the entrance to the bank and noticed that the Jeep was parked so that the passenger side was facing the bank entrance. The witness then observed an unknown individual dressed in black clothing, wearing a black hood or mask exit the Jeep from the passenger side. The witness further observed what she believed to be a black, military style rifle in the individual's hand. The witness then observed a second unknown individual exit the Jeep from the passenger side. The second individual was also dressed in black clothing, and was also wearing a hood or mask. The witness believed the second individual was also carrying a black rifle. The witness observed the two individuals enter the bank, then observed one of the two masked individuals running from the bank. The witness also observed a third unknown individual in the driver's seat of the Jeep. She described the driver as a white male with light to medium complexion, in his mid to late twenties, and with brown hair. Subsequent to this observation, the witness observed the Jeep exit the parking lot of the bank.

The witness then provided bank employees and members of the Task Force with this description of what she observed, including a Massachusetts license plate registration number of "8443X," with a further character possibly being an "L," and which the witness observed as having been affixed to same Jeep.

b) A second witness who was also outside of the bank observed a black Jeep pull up to the bank and further observed two unidentified males, in dark clothing and masks, enter the bank. The witness observed that both men appeared to be armed with machine-gun style weapons. The second witness thereafter observed the Jeep leave the bank's parking area..

c) A third witness who was exiting the bank observed a black Jeep outside of the bank, and two unidentified males exiting the Jeep. The witness observed that both males were wearing masks and one was carrying a gun.

d) A fourth witness, who was then entering the bank, observed a black Jeep, being operated by a white male, pull up in front of the bank. While inside the bank, he observed a male carrying a large rifle, who yelled "get down, you won't get hurt."

e) A teller, who was working at station number one, observed two unidentified males enter the bank. She observed that one male was wearing what initially appeared to be some sort of mask and the second male was wearing sunglasses and a face mask. The males approached the teller and told her to "give us the large bills." The teller emptied her drawer onto the counter and then ducked underneath the counter.

f) A second teller, who was working at station number three, observed two unidentified males enter the bank. She observed that the first male was white, wore a mask, and was carrying a gun and that the second male was white, wore sunglasses and a mask, and was

carrying a bag. She observed that the males approached the teller, and that one pointed the gun at him/ her, and verbally demanded all of her large bills. The teller then emptied her drawer onto the counter.

g) A third teller, who was at station number four, observed two unidentified males of unknown race enter the bank. She observed that one male was wearing a mask and carrying a gun, and the other male was wearing sunglasses and a face mask. The males told her to give them all of her large bills, which she did.

h) A fourth teller, who was at station number six, observed two unidentified males of unknown race enter the bank and that both males were wearing black clothing. One male was wearing a mask and carrying a gun, while the other male wore sunglasses and a face mask, and carried a bag. This teller observed that the males approached her and ordered her to give them all of her large bills. She then emptied her drawer onto the counter.

i) A fifth teller, who was at station number five, observed two unidentified males enter the bank, one of whom was wearing a mask and carried a large gun, while the other wore sunglasses and a face mask. This teller observed that both males went to each teller and demanded large bills. One of the males then yelled at the tellers and pointed his gun at them. The second male yelled at the tellers and put the money in his bag. When the males got to the fifth teller, she gave them all of the money from her drawer and included a dye-pack in the money she provided to the robbers.

j) Two witnesses, who were inside of the bank, observed two unidentified males armed with guns enter the bank. Both males were screaming "get down, you won't get hurt." Both witnesses then laid down on the floor.

k) Two other witnesses, who were also inside of the bank, heard someone shout "everyone stay fucking quiet and stay down!" They then heard the same individuals shout "give us all of your large bills." They then turned and observed two individuals wearing masks, one armed with what appeared to be a shotgun, and one armed with what appeared to be a handgun.

7. Subsequent to the robbery, an audit was conducted by Citizen's Bank (in accordance with its robbery response procedures) and revealed that twenty five thousand, six hundred and sixty four dollars, and sixty eight cents (\$25,664.68) was taken from the bank during the robbery.

8. An investigator from Citizens Bank provided police with a CD-ROM containing digital, video imagery from the bank surveillance cameras. The video imagery shows two unidentified males entering the bank at approximately 3:12 p.m. on August 19, 2004, and clearly shows one of the males carrying what appears to be an assault rifle and the other with a black duffel bag. Both males are dressed in black clothing and white sneakers. The video imagery shows that the males exited the bank at approximately 3:13 p.m. The video imagery then shows the Jeep leaving the parking lot at 3:13 p.m.

9. An additional witness, who was driving on the Fellsway in Melrose, Massachusetts, called the Melrose Police Department at approximately 3:20 p.m. to report that he saw two unidentified males running from the Fellsvue Terrace Condominiums, cross the street, and enter a wooded area. He observed that one of the males had a black duffel bag and that both males appeared to have other items stuffed under their shirts and in their pants. The witness then waited for the arrival of responding police officers and showed responding officers where the males had entered the wooded area. The officers then conducted a brief search of the area nearby and located a black Jeep bearing Massachusetts license plates, "8443XI." The Jeep was located in the

Fellsvievw Terrace parking lot. An initial investigation at the scene by officers revealed the following: the Jeep had previously been reported stolen, the two passenger side tires were flat, and two twenty dollar bills in the rear of the Jeep appeared to have red dye on them.

10. An additional witness who was then near Stoneham High School observed a black Hyundai parked nearby with an unidentified male in the driver's seat. He then observed two unidentified white males exiting the woods behind the high school and walking quickly towards the parked Hyundai. The first male was wearing white shorts but no shirt and appeared to be approximately six feet tall and appeared to weigh approximately one hundred and eighty-five to one hundred and ninety-five pounds. The male appeared to have had significant tattooing on his right shoulder and it appeared that his shorts were filled with something. As the first male exited the woods he waved at this witness. The second male was also wearing shorts that appeared to be filled with something and had his hands inside of his shorts. The second male appeared to be approximately five feet and nine inches tall and appeared to weigh approximately one hundred and sixty-five to one hundred and seventy-five pounds. This witness observed that paper money that appeared to be dyed red fell out of the second male's shorts onto the ground. The two males walked directly to the Hyundai that was parked nearby and entered it. The vehicle remained parked for approximately one to two minutes and then drove away. The witness followed the car onto Franklin Street and noticed a fourth male in the vehicle. Responding police officers arrived on scene, executed a motor vehicle stop, and placed the four males into custody.

11. After placing the four suspects (later identified as Mark F. Marchese, a juvenile, Torossi Wagner, and Edson Da Silva Mendes) in custody, police officers found a substantial amount of money (one bag containing approximately \$4,764.00 and another bag containing

approximately \$6,543.00) in the possession of the juvenile and which appeared to be damaged by the explosion of a dye pack. While placing Mark F. Marchese under arrest, officers noticed that his clothes were stained with red dye and further contained a substantial amount of money (approximately \$11,965.00) which was also stained with red dye.

12. Responding Police Officers subsequently searched areas in the vicinity of the Stoneham High School and recovered the following items: approximately twenty-six dollars recovered from a path behind Stoneham High School and one black duffel bag recovered from the woods behind Stoneham High School. An additional search of the nearby wooded area conducted on August 20, 2004, resulted in the recovery of the following: approximately thirty-one dollars, a pair of discarded sunglasses, a mask with the outlines of a skeleton on the front of it, a black and white face mask, a long sleeve black t-shirt, a long sleeve grey t-shirt, a black sweatshirt, black pants, and blue coveralls. Police officers also recovered a Norinco assault style firearm, Model SKSS, serial number 9211689. The firearm had one round in the chamber and had six rounds remaining in a twenty round magazine.

13. Subsequent to his/her arrest on August 19, 2004, the juvenile was advised of his/her Miranda rights, verbally waived those rights, and was then interviewed by members of the Task Force. The juvenile was interviewed a second time by me on August 26, 2004 with counsel present. The juvenile provided the following facts during these two interviews:

a) Prior to the bank robbery, an individual whom the juvenile knew as "Bo" instructed the juvenile to go meet Mark F. Marchese because he had a "job" he wanted to do. The juvenile met with Marchese and they drove in the stolen Jeep to the residence of Bo, where they met with Bo and another male known to the juvenile as "Razor Ramone." The juvenile described

Bo's residence as a white, two family house, located on the right hand side of a street off of Main Street in Everett, Massachusetts. All four individuals entered Bo's house and discussed the details of the robbery. The juvenile stated that one of the men brought out a rifle and handed it to Marchese. Bo showed Marchese how to load the rifle. Bo had purchased the rifle and planned to use funds acquired from the robbery to pay for it. When the four individuals exited the house, Marchese and the juvenile got in the Jeep, while Bo and Razor Ramone got in a red station wagon. The juvenile described the station wagon as having a rounded back. They followed Bo and Razor Ramone to the Red Stone Shopping Plaza, located on Route 28 in Stoneham, Massachusetts. At the shopping plaza, Marchese and the juvenile changed clothing in preparation for the bank robbery. Marchese, Bo, and the juvenile got into the stolen Jeep and drove to the bank. Razor Ramone stayed with the red station wagon at the shopping plaza in Stoneham.

b) The juvenile stated that after the robbery, they had planned to drive back to Stoneham and switch from the Jeep to the red station wagon, where Razor Ramone was to be waiting in the station wagon. The four then planned to make their escape in this vehicle. Marchese, Bo, and the juvenile then drove to the Citizen's Bank branch located at 876 Main Street in Malden, Massachusetts, during which time Bo became scared and wanted to back out of the robbery. Marchese convinced Bo to continue with the plan and the three individuals proceeded to the bank.

c) Upon arrival at the bank, the juvenile and Marchese exited the Jeep and donned facial coverings; Marchese wore a Halloween mask; the juvenile wore a bandana and sunglasses. The two then entered the bank. Marchese was armed with an assault rifle and the

juvenile carried a black duffel bag to collect money from the tellers. The juvenile stated that during the robbery, Marchese verbally demanded only large bills from the bank tellers, and ordered bank customers down to the ground.

d) After robbing the bank, the two returned to the Jeep and fled the area with Bo driving. The juvenile stated that while fleeing in the Jeep, a dye pack, apparently provided to them by a teller, blew up in his/her face, which caused the car to fill up with smoke. Bo stopped the Jeep and all three individuals exited the vehicle. Marchese and the juvenile ran into the backyard of a nearby house where they removed the clothing that they had worn during the robbery. Marchese and the juvenile returned to the Jeep with their clothes only to discover that Bo was gone. Marchese and the juvenile got back into the Jeep and, with Marchese driving, continued to drive along the Fellsway until two tires blew out, forcing Marchese to stop.

e) Marchese and the juvenile then exited the Jeep, taking with them the rifle and the clothes used during the robbery, as well as the duffel bag containing the dye-stained money. Then Marchese and the juvenile stuffed the remaining loose money down their pants and fled on foot across the Fellsway. The juvenile and Marchese fled into a wooded area. While fleeing through the woods they abandoned the rifle, clothes, and black duffel bag and exited the woods in back of the Stoneham High School. According to the juvenile, upon exiting the woods, they obtained a ride from two individuals in the area. The juvenile and Marchese got in the car with the two individuals and soon thereafter were stopped and arrested by the police.

15. During the second interview, the juvenile was shown a photo array consisting of six individuals. One of the photographs depicted an individual named Frank R. Bowman, Jr. The juvenile positively identified the picture of Bowman as the individual he knew as Bo.

16. I conducted a surveillance in the area of 19 Waters Avenue in Everett, Massachusetts, which is Bowman's residence. I observed a red Ford Taurus station wagon parked in front of this residence. A registration check of the vehicle's license plate determined that it was registered to Bowman's mother, Mary E. Bowman, who resides at the same address. I conducted a query of Massachusetts Registry of Motor Vehicles records and determined that on August 19, 2004, within thirty minutes of the robbery, a Stoneham, Massachusetts police officer had queried the license plate number of this vehicle while it was located in the Red Stone Shopping Plaza on Route 28 in Stoneham. This vehicle had been observed driving suspiciously through the parking lot of the shopping plaza for approximately thirty minutes prior to the officer conducting the registration check.

17. Frank R. Bowman, Jr., was indicted by a federal Grand Jury in this District for his involvement in this matter on October 27, 2004, and was interviewed on October 18, 2004, and November 9, 2004, by me and in the presence of his counsel. During these two interviews Bowman provided the following facts:

a) Bowman, Marchese, and Ramone met on more than one occasion prior to the bank robbery. During at least one of these meetings the three men and the juvenile discussed the details of the impending bank robbery, which Marchese had planned. During that meeting, Ramone agreed to drive the switch car, which Bowman identified as Bowman's mother's red Ford Taurus station wagon.

b) During the meeting where the plan for robbing the bank was laid out by Marchese, Bowman produced the assault rifle which was used in the robbery. Ramone was present and observed the rifle changing hands from Bowman to Marchese in preparation for the

robbery. It was known to the four individuals who were then present that this was the rifle that would be used to rob the bank.

c) Ramone expressed his willingness to help with the robbery, but indicated to Bowman and Marchese a hesitation to be more closely involved with the actual robbing of the bank. He then told Bowman and Marchese, "If you guys need me to drive, I will pick you up."

d) On the day of the robbery, Ramone drove the red station wagon which belonged to Bowman's mother to the Red Stone Shopping Plaza in Stoneham, parked the station wagon in the back parking lot, and began waiting until the other three men returned from the bank robbery. The plan was for Marchese, Bowman and the juvenile to return to the Red Stone Shopping Plaza after robbing the bank and to flee in the red station wagon. Using the "legal" station wagon was important to the robbery's ultimate success because it was known that the Jeep was a stolen vehicle and that police would likely be looking for it, rather than the station wagon.

e) Approximately one hour after the robbery, Bowman called Ramone on his cell phone because Bowman was still in Stoneham and needed a ride. Ramone drove to Stoneham in the red station wagon and picked up Bowman. Bowman and Ramone drove for nearly two hours before returning to Bowman's residence, during which time they discussed the robbery.

f) During the interview on November 9, 2004, Bowman was shown a known photograph of "Anthony P. Raymond," which had been provided by the Revere Police Department and was asked who was depicted in the photograph. Without hesitation, he identified the individual as "Razor Ramone" and whom, according to Bowman, he has known for several years.

19. I believe that the person whose true identity is "Anthony P. Raymond" is one and the same as the person known by multiple individuals, including the juvenile and Bowman as well as Everett Police officers familiar with this individual because of repeated interactions with him, as "Razor Ramone."

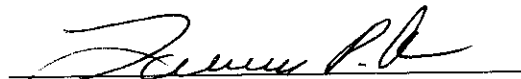
20. Based on the foregoing, I believe that probable cause exists to believe that on August 19, 2004, Anthony P. Raymond, by force and violence, or by intimidation, took from the person and presence of employees of Citizen's Bank, money belonging to and in the custody, control, management, and possession of Citizen's Bank, a federally-insured financial institution, and that in so doing, Anthony P. Raymond did assault and put in jeopardy the lives of other persons by the use of a dangerous weapon and device, to wit, a gun, in violation of 18 United States Code, Sections 2113(a) and (d).

I hereby certify that the foregoing is true and correct. Executed this 10th day of November, 2004.



ROBERT RICE, Special Agent
Federal Bureau of Investigation

Subscribed and Sworn to before me this 10th day of November, 2004.



Hon. Lawrence P. Cohen
UNITED STATES MAGISTRATE JUDGE

AO 442 (Rev. 12/85) Warrant for Arrest

United States District CourtDISTRICT OF MASSACHUSETTSUNITED STATES OF AMERICA
V.**WARRANT FOR ARREST**

ANTHONY P. RAYMOND

CASE NUMBER:

SSN: 030-52-3386
DOB: May 11, 1970To: The United States Marshal
and any Authorized United States OfficerYOU ARE HEREBY COMMANDED to arrest ANTHONY P. RAYMOND
Name

and bring him forthwith to the nearest magistrate to answer a(n)

☐ Indictment ☐ Information ☒ Complaint ☐ Order of court ☐ Violation Notice ☐ Probation Violation Petition

charging him or her with (brief description of offense)

Armed Bank Robbery;in violation of Title 18 United States Code, Section(s) 2113 (d) ;_____
Name of Issuing Officer_____
Title of Issuing Officer_____
Signature of Issuing Officer_____
Date and Location

Bail fixed at \$ _____

by _____
Name of Judicial Officer**RETURN**

This warrant was received and executed with the arrest of the above-named defendant at _____

DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		

THE FOLLOWING IS FURNISHED FOR INFORMATION ONLY:

DEFENDANT'S NAME: ANTHONY P. RAYMOND

ALIAS: Tony "Razor" Ramone

LAST KNOWN RESIDENCE: 225 Russell St., Everett, MA

LAST KNOWN EMPLOYMENT: Richey's Slush Co., Everett, MA

PLACE OF BIRTH: Chelsea, Massachusetts

DATE OF BIRTH: May 11, 1970

SOCIAL SECURITY NUMBER: 030-52-3386

HEIGHT: 5 ft 11 in WEIGHT: 250 lbs

SEX: Male RACE: Caucasian

HAIR: Brown EYES: Brown

SCARS, TATTOOS, OTHER DISTINGUISHING MARKS: unknown

FBI NUMBER: 884372TA3

COMPLETE DESCRIPTION OF AUTO: unknown

INVESTIGATIVE AGENCY AND ADDRESS: Federal Bureau of Investigation, 1 Center Plaza, Suite, 600, Government Center, Boston, Massachusetts

JS 45 (5/97) - (Revised USAO MA 3/25/02)

Criminal Case Cover Sheet**U.S. District Court - District of Massachusetts**

Place of Offense: _____

Category No. IIInvestigating Agency FBICity Malden

Related Case Information:

County Middlesex

Superseding Ind./ Inf. _____

Case No. 04-10293-JLT

Same Defendant _____

New Defendant X

Magistrate Judge Case Number _____

Search Warrant Case Number _____

R 20/R 40 from District of _____

Defendant Information:Defendant Name ANTHONY P. RAYMOND

Juvenile

☐ Yes☒ NoAlias Name unknownAddress 225 Russell Street, Everett, MABirth date: 1971SS#: 3386Sex: MRace: CaucasianNationality: USA

Defense Counsel if known: _____

Address: _____

Bar Number: _____

U.S. Attorney Information:AUSA Paul R. MooreBar Number if applicable 632312

Interpreter:

☐ Yes☒ No

List language and/or dialect: _____

Matter to be SEALED:

☐ Yes☒ No☒ Warrant Requested☐ Regular Process☐ In Custody**Location Status:**

Arrest Date: _____

☐ Already in Federal Custody as _____

in _____

☐ Already in State Custody _____☐ Serving Sentence☐ Awaiting Trial☐ On Pretrial Release: Ordered by _____

on _____

Charging Document:

☒ Complaint☐ Information☐ Indictment

Total # of Counts:

☐ Petty _____☐ Misdemeanor _____☒ Felony 1

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: November 10, 2004Signature of AUSA: Paul R. Moore

District Court Case Number (To be filled in by deputy) _____

Name of Defendant ANTHONY P. RAYMOND

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	18 U.S.C. § 2113(d)	Armed Bank Robbery	
Set 2			
Set 3			
Set 4			
Set 5			
Set 6			
Set 7			
Set 8			
Set 9			
Set 10			
Set 11			
Set 12			
Set 13			
Set 14			
Set 15			

District Court Case Number (To be filled in by deputy) _____

Name of Defendant ANTHONY P. RAYMOND

ADDITIONAL INFORMATION: _____

